

The Honorable J. Richard Creatura

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT TACOMA

UNITED STATES OF AMERICA,	)	CASE NO. MJ20-5000
	)	
Plaintiff,	)	<b>COMPLAINT for VIOLATION</b>
	)	<b>18 U.S.C. § 2252(a)(2), (b)(1)</b>
v.	)	
	)	
KOLTIN JEROME LOZIER,	)	
	)	
Defendant.	)	

BEFORE, The Honorable J. Richard Creatura, United States Magistrate Judge, U.S.  
Courthouse, Tacoma, Washington.

**COUNT 1**

**(Distribution of Child Pornography)**

On or about December 2019, in Pierce County, within the Western District of Washington, and elsewhere, KOLTIN JEROME LOZIER knowingly distributed, and attempted to distribute, visual depictions, the production of which involved the use of minors engaging in sexually explicit conduct, and the visual depictions were of such conduct, using any means and facility of interstate and foreign commerce and which images had been mailed and shipped and transported in and affecting interstate and foreign commerce by any means, including by computer.

COMPLAINT/LOZIER - 1  
MJ20-5000

UNITED STATES ATTORNEY  
700 Stewart Street, Suite 5220  
Seattle, Washington 98101-1271  
(206) 553-7970

1 All in violation of Title 18, United States Code, Section 2252(a)(2), (b)(1).

2 And the Complainant states that this Complaint is based on the following  
3 information:

4 I, Kyle McNeal, being first duly sworn on oath, depose and say:

5 **I. INTRODUCTION**

6 1. I am a Special Agent (SA) of the Federal Bureau of Investigation (FBI),  
7 assigned to the Tacoma, Washington, Resident Agency of the Seattle, Washington, Field  
8 Office. I am a graduate of the FBI Academy in Quantico, Virginia, and I have been  
9 employed by the FBI as a Special Agent since April 2011. As part of my duties, I  
10 investigate criminal violations relating to child exploitation and child pornography,  
11 including violations pertaining to the illegal production, distribution, receipt, and  
12 possession of child pornography and material involving the sexual exploitation of minors  
13 in violation of 18 U.S.C. §§ 2251, 2252(a), and 2252A(a). In my time as a law  
14 enforcement officer, I have investigated cases involving the sexual abuse of minors.

15 2. As further detailed below, based on my investigation and the investigation  
16 of other law enforcement officers, I believe there is probable cause to conclude that  
17 KOLTIN JEROM LOZIER has committed the offenses charged in Count 1 of this  
18 Complaint—namely, distribution of child pornography in violation of 18 U.S.C.  
19 § 2252(a)(2), (b)(1).

20 2. The facts set forth in this complaint are based on my own personal  
21 knowledge; knowledge obtained from other individuals during my participation in this  
22 investigation, including other law enforcement officers; review of documents and records  
23 related to this investigation; communications with others who have personal knowledge  
24 of the events and circumstances described herein; and information gained through my  
25 training and experience.

26 3. Because this complaint is offered for the limited purpose of establishing  
27 probable cause, I list only those facts that I believe are necessary to support such a  
28

1 finding. I do not purport to list every fact known to me or others as a result of this  
2 investigation.

## 3 II. SUMMARY OF PROBABLE CAUSE

4 1. On or about December 19, 2019, an individual known as FOREIGN  
5 TARGET<sup>1</sup> was arrested in Australia for sexually abusing both of his toddler age children  
6 and filming that abuse. According to Australian law enforcement, FOREIGN TARGET  
7 also used internet messaging apps, including Telegram and Kik, to communicate with  
8 others about the sexual abuse of his toddler son.

9 2. During an interview with the police, FOREIGN TARGET identified  
10 another individual with whom he communicated, providing that individual's specific  
11 moniker on Telegram. Through further investigation, FBI tied that moniker to KOLTIN  
12 JEROME LOZIER, a resident of Graham, Washington. According to FOREIGN  
13 TARGET, LOZIER was into necrophilia and hurt core and had sent FOREIGN TARGET  
14 particularly disturbing videos. I know from my training and experience that "hurt core"  
15 generally refers to depictions of children being tortured or mutilated for the purpose of a  
16 viewer's sexual gratification. FOREIGN TARGET also reported that LOZIER said he  
17 had a minor relative and offered to send FOREIGN TARGET images of that relative.  
18 Additionally, FOREIGN TARGET referenced a statement made by LOZIER in which he  
19 said he ejaculated into a milkshake and then shared that milkshake with this minor  
20 relative.

21 3. During my investigation, I obtained copies of chats between FOREIGN  
22 TARGET. LOZIER sent multiple pictures of himself to FOREIGN TARGET. He also  
23 referred to himself as "Kolt" during those chats. As indicated by FOREIGN TARGET,  
24 Lozier also offered to send pictures of a minor relative and described an incident in which  
25 he ejaculated into a milkshake intending to and actually sharing that milkshake with the  
26 male relative.

27  
28 <sup>1</sup> The online moniker of this offenders is known to law enforcement, but I have not included it in this affidavit in  
order to avoid public disclosure of information that could interfere with other investigations arising from FOREIGN  
TARGET's arrest.

1 4. LOZIER also sent the following message:

2 Hey bro could u give me a second to just apologize to you. Please ? I  
3 promise I'll leave u alone no need to block. I thought u wanted hardcore so  
4 that's why I sent those vids I truly thought u were cool and I have more  
5 vids to send u that arnt extreme like the ones that u blocked me about I also  
6 have tons of gigabytes of baby vids boy vids dog and cat vids no brutal  
7 extreme I promise

8 5. Later in their exchange, FOREIGN TARGET explained that "baby  
9 fucking" and "children having sex with animals" is as far as he is willing to go and asks  
10 LOZIER to refrain from sending "extreme gore."

11 6. Between December 23, 2019, and January 1, 2020, an undercover agent  
12 began communicating via Telegram with LOZIER. Although he had changed his  
13 Telegram moniker, the name remained similar to that he used with the FOREIGN  
14 TARGET. In addition, the profile photo associated with that Telegram account is a photo  
15 of LOZIER. During their conversations, LOZIER also provided his phone number,  
16 which I have confirmed belongs to LOZIER.

17 7. During these communications, LOZIER invited the undercover agent to  
18 join a group he administers that is devoted to the sharing of child exploitation material  
19 and shared numerous images and videos of prepubescent minors being raped and sexually  
20 abused. Among the images and videos LOZIER shared are the following:

21 **FILE 1**

22 This video is approximately 26 seconds in length. The video depicts an adult male  
23 having anal sex with a child. The child appeared to be approximately two to three  
24 years of age, based on the body size of the child compared to the adult male's  
25 penis.

26 **FILE 2**

27 This video is approximately 10 seconds in length. The video depicts a male infant,  
28 nude from the waist down, lying on his back. An adult male attempted to penetrate  
the infant's anus with his penis.


8.

1           9.     The chat room described above, of which LOZIER was an administrator,  
2 also contained numerous postings of images and videos constituting “hurt core”—that is,  
3 visual depictions showing the violent rape, torture, and/or mutilation of minors.

4           10.    On December 30, 2019, I obtained a search warrant for LOZIER’s home  
5 and person, a team of law enforcement executed on January 2, 2020. Upon encountering  
6 LOZIER and asking him if he would be willing to speak with law enforcement, I advised  
7 him of his constitutional rights. He identified his cell phone as an Apple iPhone 6, with  
8 telephone number 253-507-2706. This is the same number LOZIER provided to the  
9 undercover officer in their communications. And when asked for his password, he asked  
10 to speak with an attorney, and the interview concluded.

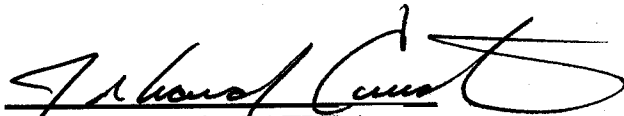
**CONCLUSION**

11. Based on the above facts, I believe that there is probable cause to conclude that KOLTIN JEROME LOZIER committed the offense charged in this Complaint.

  
KYLE MCNEAL, Complainant,  
Special Agent  
Federal Bureau of Investigation

Based on the Complaint and Affidavit sworn to before me, and subscribed in my presence, the Court hereby finds that there is probable cause to believe the Defendant committed the offenses set forth in the Complaint.

DATED this 2nd day of January, 2020.

  
J. RICHARD CREATURA  
United States Magistrate Judge